



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Notice of Violation - USX Corporation
Clairton and Edgar Thomson Plants

FROM: Bernard E. Turlinski, Chief
Air Enforcement Branch (3AT20)

TO: Thomas J. Maslany, Director
Air, Radiation & Toxics Division (3AT00)

Recommended Action

It is recommended that you sign the attached Notice of Violation (NOV) informing USX Corporation that it is operating its Clairton and Edgar Thomson plants located near Pittsburgh, Pennsylvania in violation of applicable Pennsylvania air pollution control requirements.

Rationale

USX Corporation owns and operates both a coke plant and a steel manufacturing plant located near Pittsburgh, Pennsylvania. These plants are equipped with boilers for the production of steam and the Clairton plant contains coke oven batteries for the production of metallurgical coke used in the ironmaking process. These units emit nitrogen oxides (NOx) due to the combustion of various fuels.

Based on documents submitted by the Pennsylvania DER to EPA containing information from USX, Allegheny County, and the DER-Pittsburgh Office, EPA has found both plants operations to be in violation of applicable air pollution control requirements. The violations consisted of the failure to install, operate and maintain NOx CEMs on various combustion units at both plants in violation of the Pennsylvania SIP.

These monitors are required by the State of Pennsylvania in order to further the State's Acid Rain Program. The Corporation has communicated to the County the wish to operate parametric monitoring systems instead of CEMs but this is contrary to the requirements of the federally-enforceable Pennsylvania regulation.

HAGEDORN(jmw) H:NOV94.USX 5/18/94

CONCURRENCES							
SYMBOL	3AT21	3AT21	3AT20				
SURNAME	HAGEDORN	ABRAMS	TURLINSKI	COMPTON	MILLER		
DATE	5/19/94	5/19/94	5/19/94	5/19/94	5/19/94		

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

Printed on Recycled Paper

ED_002508A_00000371-00001

EPA's plan to issue this NOV has been communicated to the Pennsylvania DER Office in Pittsburgh and no concerns have been indicated by the State. The DER believes that EPA's issuance of the NOV would help expedite compliance by USX Corporation. These plants are located within the jurisdictional area of the Bureau of Environmental Quality but this local agency does not have a similar regulation on its books to compare with the State regulation. The County has indicated that it will/can not enforce the State regulation and the State would have to do it.